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June 19, 2019

**VIA EMAIL AND ECF**

Hon. Robert Lehrburger  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Rudersdal, EOOD, et al. v. Harris, et. al.*, Case Nos. 18-cv-11072, 19-cv-01762  
(S.D.N.Y)

Dear Judge Lehrburger:

Defendant Bulgartabac Holding AD, on behalf of itself and Defendants First Investment Bank, AD; Tseko Todorov Minev; Ivailo Dimitrov Mutafchiev; Tabak Market, AD (now known as Lafka Market, AD); Cibole Services Incorporated, Bulgaria, EOOD; Asteria BG, EOOD (a/k/a Droslian Bulgaria, EOOD); Vili Vist, EAD; Promishleno Stroitelstvo Holding, EAD; Delyan Slavchev Peevski; Intrust PLC (f/k/a NSN Investment EOOD); Philip Robert Harris; Eaton Vance Management; and The Bank of New York Mellon Corporation, respectfully requests leave to file a joint opposition to Plaintiffs' June 13, 2019 letter that exceeds the three-page limit for Letter Motions pursuant to Section III.B. of Your Honor's Individual Practices in Civil Cases. Plaintiffs' June 13 letter was four pages long. We sought, but were unable to secure, Plaintiffs' consent to our request to exceed the page limit.

Since we are submitting a joint letter on behalf of 14 defendants, represented by seven separate law firms, we require additional pages to adequately respond to Plaintiffs' individualized requests for jurisdictional discovery as to each Defendant. The length of our response will not exceed seven pages.

For these reasons, we respectfully request the Court to extend the page limit for our response to Plaintiffs' June 13 letter to seven pages.

Hon. Robert Lehrburger, p. 2

Respectfully submitted,

/s/ Abena A. Mainoo

Abena A. Mainoo

cc: Counsel for all parties (via ECF)